

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Scott Romeo,
Plaintiff

v.

SIMM Associates, Inc.,
Defendant

Docket 3:15-cv-02136-RPC-JFS

(JUDGE RICHARD P. CONABOY)

(MAGISTRATE JUDGE JOSEPH
F. SAPORITO)

FILED ELECTRONICALLY

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEY'S FEES AND
COSTS PURSUANT TO 15 U.S.C. § 1692K**

1. On December 8, 2015, Defendant tendered an offer of judgment pursuant to Fed. R. Civ. P. 68. Plaintiff accepted this offer on December 15, 2015. A copy of the offer and acceptance is attached to [Doc. 15 as Exhibit A](#).

2. Pursuant to 15 U.S.C. § 1692k, Plaintiff is also entitled to an award of fees and costs.

3. Plaintiff requests an award of fees and costs in the amount of \$14,121.05.

4. The motion should be granted for the reasons set forth in the brief being contemporaneously filed, as well as the supporting documents and affidavits attached hereto.

5. Plaintiff will provide a supplemental amount of fees and costs at the time he submits his reply brief. This supplemental request will only include time spent

after the filing of this motion. Plaintiff estimates that the supplemental time will amount to between 10 and 30 hours.¹

s/ Brett Freeman
Brett Freeman
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CERTIFICATE OF SERVICE

Service is being effectuated via the CM/ECF system.

s/ Brett Freeman
Brett Freeman

¹ This Court's order of January 27, 2016 required the parties to file, no later than today, a brief outlining their respective positions on (a) the question of what attorney's fees are due and owing to the Plaintiff; and (b) any other lingering issues that remain in the case. (Doc. 14.) Plaintiff's position is that once a judgment has been entered in the case, and the attorney's fee dispute has been resolved, no other issues will remain.